

EXHIBIT I
LORI HOUSTON DEPOSITION

1 UNITED STATES DISTRICT COURT
2 WESTERN DISTRICT OF TEXAS
3 SAN ANTONIO DIVISION
4 ALBERT SIDNEY JOHNSTON)
5 Chapter No. 2060, United
6 Daughters of the
7 Confederacy, ROBIN
8 TERRAZAS, President, JEAN
9 CAROL LANE, First
10 Vice-President,
11 PLAINTIFFS,
12 VS.) CIVIL ACTION NO.
13 THE CITY OF SAN ANTONIO,) SA-17-CV-1072-DAE
14 DEFENDANT.)
15

16 *****
17 ORAL DEPOSITION OF
18 LORI HOUSTON
19 AUGUST 24, 2018
20 *****

21 ORAL DEPOSITION of LORI HOUSTON, produced as a
22 witness at the instance of the Plaintiffs, and duly
23 sworn, was taken in the above-styled and numbered
24 cause on the 24th day of August, 2018, from 3:06 p.m.
25 to 4:02 p.m., before Sharon L. McDonald, CSR, in and
for the State of Texas, reported by machine shorthand,
at the offices of City of San Antonio, 506 Dolorosa,
Building 2, San Antonio, Texas, pursuant to the
Federal Rules of Civil Procedure and the provisions
stated on the record or attached hereto.

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ALSO PRESENT:

14 Robin Terrazas
15 Jean Lane
16 Lori Houston, the Witness
17 Sharon L. McDonald, CSR
18
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21
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23
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25

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LORI HOUSTON,

2 having been first duly sworn, testified as follows:

EXAMINATION

BY MR. CRANE:

3
4 Q Would you state your name, please, Ms. Houston?
5 A Lori Houston.
6 Q And what is your job title?
7 A I'm an assistant manager for the City of
8 San Antonio.
9 Q And how long have you been doing that?
10 A I've been since 2015, so three years.
11 Q And what kind of job duties do you have doing
12 that?
13 A I oversee several departments within the City of
14 San Antonio. Currently it's the Center City Development
15 Operations Department. We oversee the parking
16 operations, River Walk operations, downtown parks and
17 development, the library system, 31 libraries in the city
18 of San Antonio, the arts and culture department, the
19 World Heritage Office and the Alamo Master Plan.
20 Q That's a long list. So I guess, then, you would
21 be supervising the directors of each of those
22 departments?
23 A Yes, sir.
24 Q Is that your sum total of the people you
25

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1 supervise?
 2 A I also supervise -- I just recently was
 3 supervising the EastPoint office, but they have moved on
 4 to a different division, so that's it.
 5 Q And who would your supervisor be?
 6 A Sheryl Sculley.
 7 Q And she is the city manager?
 8 A Yes, sir.
 9 Q Have you ever done a deposition before?
 10 A Yes.
 11 Q Do you understand that you shouldn't answer a
 12 question unless you understand the question?
 13 A Yes.
 14 Q And when you were deposed -- more than once?
 15 A Once only.
 16 Q Once only.
 17 THE WITNESS: I think you were there for
 18 that one.
 19 (Pause.)
 20 Q (BY MR. CRANE) And the Office of Historic
 21 Preservation, what department would that be in?
 22 A Well, the Office of Historic Preservation, I
 23 actually used to oversee them several years ago. Or not
 24 several years ago. Actually, within the past year and a
 25 half. And that transferred to Rod Sanchez. But it's its

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1 Q So you think Page Mr. Nirenberg became the
 2 mayor that you didn't have a discussion about possibly
 3 moving that?
 4 A There was discussion about what to do with the
 5 monument, whether to put it in historical context,
 6 whether to move it, but there was no decision. It was
 7 always discussion because it was around the time the
 8 other discussions nationwide were happening.
 9 Q So what's the earliest point you can remember
 10 having a discussion about moving or not moving the Travis
 11 Park memorial?
 12 A It probably would have been January. Actually,
 13 I would say early 2018[sic], around that time. I'd have
 14 to -- I remember -- I don't know the date, honestly. I
 15 just remember there being a discussion, Councilman
 16 Trevino proposing some options about putting it in
 17 historical context, and then a CCR was issued. But it's
 18 probably about a year, year and a half.
 19 Q Okay. And then I think at the August 31st city
 20 council meeting where they took the vote, I think you
 21 gave a presentation about moving it or not moving it?
 22 A Yes.
 23 Q Do you remember what you did to prepare for that
 24 briefing?
 25 A Well, my department, Center City Development

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1 own department and they used to report to me, but now
 2 they report to Rod Sanchez.
 3 Q And before you became assistant city manager,
 4 were you employed by the City?
 5 A Yes. I've been there for 16 years.
 6 Q Oh, great. Has anybody discussed with you today
 7 what your testimony should be?
 8 A No. I know what it's about.
 9 Q Sure. So other than Mr. Fitzpatrick or somebody
 10 with the city attorney's office, have you discussed your
 11 testimony with anyone?
 12 A No.
 13 Q Before today?
 14 A No.
 15 Q Do you remember when you first became aware of a
 16 consideration that -- moving the Travis Park memorial?
 17 A Yes.
 18 Q When did that happen?
 19 A There was a CCR that was issued by Councilman
 20 Shaw and Councilman Trevino asking us to begin a process
 21 to see, you know, how you might put into context and
 22 other opportunities. There was a brief discussion, but
 23 then there was a discussion by the mayor. Mayor Ron
 24 Nirenberg asked that we consider moving the statue and
 25 that was last summer.

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1 Office, was responsible for the relocation. We have
 2 Office of Historic Preservation, which was responsible
 3 for doing the history and the research. They have
 4 purview over it. And then we worked with the city
 5 attorney's office. So I prepared working with all three
 6 of those departments and prepared my presentation based
 7 on the history of the monument, history of the cannons,
 8 history of the park, and then looking at our overall
 9 authority to relocate. So I worked with all those
 10 departments.
 11 Q Did you prepare your briefing yourself or did
 12 somebody help you with that?
 13 A I worked with the city attorney's office on
 14 that.
 15 Q But drafting slides, putting pictures --
 16 A Andy Segovia and myself worked on that together.
 17 I probably got pictures from the Office of Historic
 18 Preservation and the Center City Development Operations
 19 Department.
 20 Q And you mentioned the history and the research
 21 regarding -- was that regarding the monument or Travis
 22 Park or both?
 23 A All -- all three, the monument, the cannons and
 24 the park.
 25 Q And do you remember who gathered -- who did the

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1 research?
 2 A The Office of Historic Preservation.
 3 Q And that's headed, I guess at the time, by
 4 Shannon Miller?
 5 A It still is headed by Shannon Miller.
 6 Q It still is, yes.
 7 As you prepared -- well, let's -- if your
 8 presentation was August 31st, and that's when they took
 9 the vote, do you remember how long before that you
 10 started working on -- well, let me rephrase the question
 11 yet again.
 12 How long did it take you to prepare your
 13 briefing? Was it days? Weeks?
 14 A It happened very fast. We -- the decision to
 15 consider the monument's relocation in front of council
 16 was probably mid-August, and so I prepared it the week
 17 prior.
 18 (Exhibit 1 marked.)
 19 Q (BY MR. CRANE) I show you what's marked Houston
 20 Exhibit 1.
 21 A Okay.
 22 Q And as I understand it, this -- well, this has a
 23 lot of things to it.
 24 A Uh-huh.
 25 Q And, of course, the ordinance is in the front,

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1 A Yes.
 2 Q -- Number 000142 in the lower right-hand corner.
 3 A Yes.
 4 Q That came from the city attorney's office?
 5 A They helped draft this, yes. I mean, not the
 6 slide, but the information.
 7 Q Sure. That's what I'm asking, where the
 8 information came from.
 9 A Uh-huh.
 10 Q But the other question is: How long did it take
 11 you to gather the history or the research that you
 12 presented to the city council?
 13 A The history had been developed way before
 14 because it wasn't -- the history was developed when we
 15 were looking at, you know, the whole historic context
 16 issue because at the time, there was discussion about
 17 what do you do with the monument.
 18 Q Sure.
 19 A So I recall having discussions with Councilman
 20 Shaw and Councilman Trevino about, you know, putting it
 21 in historical context. Councilman Trevino had proposed
 22 maybe doing different panels that showed the history. I
 23 believe that was in the Rivard report. And then we had
 24 talked about other ideas. Actually, other relocation
 25 ideas as well.

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1 but if you go to the back, I believe these are your
 2 briefing slides or a good portion of them.
 3 A Yes.
 4 Q (BY MR. CRANE) I wanted to ask you about those
 5 slides.
 6 A Sure.
 7 Q I think you already testified it took you, you
 8 think it was days, maybe, getting these slides together?
 9 A Putting the PowerPoint together.
 10 Q The PowerPoint, yeah. And the information
 11 contained on here, how about that? Is that what you
 12 gathered from the Office of Historic Preservation?
 13 A Depends on which slide. I mean, the pictures.
 14 So --
 15 Q Let's go -- there's pages in the lower
 16 right-hand corner.
 17 A So I would have worked with the Office of
 18 Historic Preservation on the actual history. How did the
 19 monument come to San Antonio? What was the history? Who
 20 was the artist of the monument? I would have worked with
 21 them on the cannons. We did research on that. The
 22 Travis Park history. This information, that would have
 23 come from the city attorney's office.
 24 Q And you're pointing to the slide that says
 25 actions --

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1 Q Uh-huh.
 2 A But it was -- that was it. But that history had
 3 been developed years prior. We actually had the history
 4 when we did the Travis Park redevelopment in 2014 of the
 5 actual park and the monument, so it's easily available.
 6 Q So when you're talking about the history or the
 7 research, that would have been months before the
 8 August 31st city council meeting. Are we talking years
 9 or months?
 10 A I'm talking -- I mean, when I'm talking about
 11 history, I'm like when was the park developed? How did
 12 we get the park? The cannons. Where did they come from?
 13 They came from New Mexico. Why were they there? The
 14 monument. The Bee Chapter, who donated it. Talking
 15 about the artist being from New Orleans. That
 16 information all came from Office of Historic Preservation
 17 and we had that a year. I mean, it wasn't new
 18 information that just came out.
 19 Q Sure.
 20 A Two weeks prior.
 21 Q Sure. That's what I'm asking. And so then when
 22 you discussed other ideas with Councilmen Shaw and
 23 Trevino, do you remember what the other ideas were?
 24 A They had issued a CCR talking about just looking
 25 at different opportunities, looking at having a committee

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1 that looks at this, and that's what we discussed. You
 2 know, the context, looking at, like I said, the panels,
 3 looking at other options. Maybe doing artwork. Just
 4 brainstorming ideas, but nothing was ever put in stone.
 5 Q And what did the brainstorm include? Did
 6 anybody ever give consideration to maybe adding another
 7 statue or something to reflect more context -- more
 8 historical context?

9 A No. The only -- I only recall Councilman
 10 Trevino talking about different panels. And we had
 11 talked about putting pavement markings that talk about
 12 the history. That was it.

13 Q Do you remember how many meetings -- well, did
 14 you have meetings with the council members or did you
 15 have meetings with Office of Historic Preservation staff?

16 A We had -- I know we had one meeting. I recall
 17 one meeting. We may have had two. But we did have
 18 meetings to talk about this.

19 Q And who would be -- who would be included in
 20 those meetings?

21 A It would have been Office of Historic
 22 Preservation, Councilman Shaw, Councilman Trevino. I
 23 believe Juan Ayala was in that meeting, and that's all I
 24 recall.

25 Q And who -- I'm not familiar with Juan Ayala.

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1 Cannons
 2 Q What forms your belief the City owns the statue?
 3 A Well, the City of San Antonio owns the park.
 4 The statue was donated to the City for that purpose. We
 5 have a survey that shows where that statue goes. And the
 6 cannons were donated to the City as well. And we
 7 maintain the park and the monument.

8 Q What suggests to you that the statue was donated
 9 to the city?

10 A That's the history that we have.

11 Q Do you remember anything in particular, any
 12 particular document, or any particular person saying --

13 A No.

14 Q -- we believe it was donated to the City?

15 A This is the history that I've gathered from
 16 Office of Historic Preservation and our city attorneys.

17 Q Well, the city attorney doesn't research
 18 historical issues, do they?

19 A No. But if you're talking about ownership, I
 20 mean, that's something that we knew before we went to
 21 council. That was all researched.

22 Q Did anybody -- did it occur to anybody at these
 23 meetings to contact the Daughters and see if they agreed
 24 that the City owned the statue?

25 A No.

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1 A He's the office of -- he's the executive
 2 director -- I forget his title -- over Military Affairs
 3 for the City. General Ayala.

4 Q And do you think these -- you mentioned two or
 5 three meetings. Did these meetings extend over months or
 6 weeks?

7 A I specifically recall one meeting and it was
 8 after the CCR was developed. We may have had another
 9 one, but it was really just to talk about, you know, the
 10 options, what we could do. And then, like I said,
 11 Councilman Trevino showed his renderings to the Rivard
 12 Report. There was a discussion, but that was it. I
 13 don't recall a lot of meetings on this issue.

14 Q At the few meetings you did have, do you
 15 remember anybody bringing up the Daughters of the
 16 Confederacy?

17 A Oh, we talked about that. We talked about the
 18 Daughters. We talked about the Sons. We talked about
 19 the cemeteries.

20 Q Did anybody suggest that maybe the Daughters
 21 have some kind of right or ownership interest in the
 22 statue?

23 A No.

24 Q That never came up?

25 A No. We own the statue and the park and the

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1 Q I'm showing you again Exhibit Number 1, and ask
 2 you to look at the first page, if you would.

3 A Sure.

4 Q If you look at the top. Just to -- for clarity,
 5 I guess this is the ordinance that was passed; is that
 6 correct?

7 A Yes.

8 Q And that was passed by a vote on August 31st of
 9 2017?

10 A Yes.

11 Q And it says at the top, 08/31/2017, 0598; is
 12 that correct?

13 A Yes.

14 Q And that would indicate it was passed on that
 15 date; is that right?

16 A Yes.

17 Q And then it has a -- at the top it says an
 18 ordinance, and then there's a paragraph the begins with,
 19 Authorizing the removal and storage of the Confederate
 20 soldier monument.

21 A Uh-huh.

22 Q At the bottom of this paragraph, it talks about
 23 waiving the provisions of Section 35-640 and 35-803 of
 24 the UDC. Do you recall what those provisions provide
 25 for?

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1 A Those are provisions for HDRC review, I believe.
2 Q So this is stating that we're waiving the HDRC?
3 A We're waiving that, yes.
4 Q Do you remember why?
5 A Actually, I do, because at the time -- HDRC is
6 advisory, but they're advisory to the city manager. This
7 decision is a policy decision that city council wanted to
8 make, and so it was a decision to be made by the mayor
9 and city council. So it was waived specifically because
10 the mayor requested it be considered by city council.
11 Q When you say a decision the city council would
12 make, is that in regards to waiving the UDC or
13 removing --
14 A Removing the monument.
15 Q And what suggests to you that city council as a
16 whole wanted to move the monument?
17 A The mayor suggested that. He specifically
18 requested that we take something to council looking at
19 the relocation, requesting it be moved.
20 Q So what indicated to you was something that
21 occurred before August 31st?
22 A Yes.
23 Q Do you remember when he made his indication that
24 he would prefer to move the monument?
25 A It was really about two weeks prior.

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1 A And the fact that it happened, was there some suspicion
2 that that might happen in San Antonio?
3 A No.
4 Q Was there some, I don't know, intelligence from
5 the police or someone saying there's plans for some kind
6 of a rally --
7 A No, there was not.
8 Q -- or protest?
9 A No.
10 Q Nothing that you know of?
11 A No. We did have that rally the same day as
12 Charlottesville, I believe.
13 Q There was a rally here in town.
14 A There was a rally, but I don't think it was -- I
15 don't know how many people attended. It was actually two
16 organizations.
17 Q This ordinance -- yes, it is an ordinance,
18 08/31/2017 0598. Do you know who drafted this?
19 A That would have been our city attorney. I
20 forget at the time who drafted this. I worked directly
21 with Andy Segovia. It may have been -- I'm not going to
22 guess.
23 Q Whatever you remember. If you're guessing, if
24 you could just explain that you are guessing so that
25 we're --

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1 Q And if you would, there's several whereases. If
2 you look at the second to the last whereas down here.
3 A Yes.
4 Q Whereas, the City of San Antonio wants Travis
5 Park to be a community gathering area where all can feel
6 safe and welcomed.
7 Was there an issue with all people feeling
8 safe and welcome in Travis Park?
9 A No. We just wanted -- we wanted to make sure
10 that we kept it that the way.
11 Q And then there's a whereas above it right there,
12 it's the fourth one from the bottom. It says, Over the
13 past several years there has been a national debate over
14 public memorials, devastating incident in
15 Charlottesville, Virginia.
16 Was there a concern that what happened in
17 Charlottesville, Virginia, could happen in San Antonio?
18 A Absolutely. There's always a concern about
19 that. That's what's happening nationwide. But this
20 was -- this was not a decision that was made because of
21 Charlottesville. This was a decision that's been a
22 debate going on and it was elevated by all these national
23 incidences, yes.
24 Q Was there anything -- I mean, everyone is
25 familiar with the incident in Charlottesville, but other

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1 A I believe it was Ed Guzman who drafted this.
2 Q You've done a deposition, at least one before,
3 all you can do is talk about what you recall.
4 A Yes.
5 Q Just if you would be careful to explain you may
6 not recall exactly, and then the record will be clear.
7 A I may not recall exactly.
8 Q Correct. You're getting the hang of it.
9 A Perfect.
10 Q I want to bring you back to the first page. At
11 the very bottom of there whereas.
12 A Yes.
13 Q It says, Whereas, the Confederate monument and
14 cannons should be removed and placed in a location --
15 communicated in an instructive and not divisive way.
16 A Uh-huh.
17 Q Who on the city staff, to your knowledge,
18 suggested the Travis Park memorial was communicating
19 something in a divisive way?
20 A I don't recall.
21 Q Do you know where this language came from?
22 A I do not.
23 Q Did you ever hear Council Member Shaw or Trevino
24 suggest that it was divisive in some way?
25 A I can't recall if he used the word divisive. I

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1 can recall -- and I'm speaking to August 31st, the
2 council action. Councilman Shaw was very passion ate
3 about the issue.

4 Q Before August 31st, do you --

5 A Oh, no.

6 Q -- remember any council members suggesting it
7 was divisive in some way?

8 A No.

9 Q Would you turn to the second page.

10 A Sure.

11 Q Well, I'll help you with that. At the lower
12 right-hand corner, it says COSA00136. If you look at
13 Section 3, it says the city manager or her designee
14 will -- is authorized to execute a professional service
15 contract to remove and relocate the monument.

16 Was that you that did the -- were you
17 designated to do that?

18 A Yes.

19 Q In fact, I think I've seen your signature on a
20 contract to remove and relocate?

21 A Yes.

22 Q What kind of process did you follow to do that?

23 A Well, city council authorized us to do that.

24 Q Sure.

25 A We identified Vault Services to move it.

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Designee. Are you her designee?

2 A I am.

3 Q Is there a committee up and running to talk
4 about that yet?

5 A We do have a committee of city staff that is
6 looking at possible entities we could partner with, but
7 we do not have an executed agreement.

8 Q Has the committee met?

9 A Yes.

10 Q Do you know how many times it's met?

11 A Probably four or five.

12 Q And I guess the first meeting would have been
13 after the monument had come down?

14 A Oh, yes.

15 Q Do you have anybody outside of -- any non-city
16 employees sitting on the committee?

17 A The San Antonio Conservation Society and the
18 Texas Historic Commission.

19 Q Was there any consideration to asking if someone
20 from the Sons of Confederate Veterans or Daughters of
21 Confederate Veterans to sit on the committee?

22 A No.

23 Q Is there a reason why?

24 A We wanted to keep it to internal committee, and
25 then experts who knew how to handle art and then also

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1 They -- I found that they had done that before. They did
2 that for Austin. And so we asked them to submit a
3 proposal and we went to council authorizing us to execute
4 that.

5 Q Did anyone else submit a proposal?

6 A No.

7 Q Did you ask anyone else to submit a proposal?

8 A No.

9 Q Is there a requirement to collect three bids?

10 A I wouldn't know. I was looking at someone who
11 could -- this is such a specific issue. You want someone
12 who can take care of the monument and relocate the
13 monument, and I wanted to go to somebody who knew how to
14 do it and could protect it in a safe way.

15 Q Do you remember -- if the vote was taken
16 August 31st to remove it, do you remember how far before
17 that you contacted Vault?

18 A It would have been about two weeks.

19 Q And then if you would, look at Section 4 on that
20 same page, It says the city manager or her designee will
21 develop a nonprofit for a place to put the Confederate
22 soldier monument and two cannons. To your knowledge, has
23 that occurred?

24 A No, it has not.

25 Q Do you know -- it says the city manager or her

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1 have the historical context with the THC and the
2 Conservation Society.

3 Q I'm going to help you out and tell you some
4 pages I wanted to ask you about. Lower right-hand
5 corner, 144. At the top that says City of San Antonio,
6 Legislation Details with text, can you summarize what the
7 purpose of this document is? It says at the top, Staff
8 briefing with ordinance.

9 A This is a council briefing that's attached for
10 every council member to review to give them a briefing on
11 the actual action they'll be taking at that meeting, and
12 then it provides the summary, briefing background and
13 fiscal impact. This is posted with the agendas.

14 Q So would this have been part of your
15 presentation on August 31st?

16 A No. This was -- this was part of the agenda.

17 Q I see.

18 A So when you post the city agenda, then you have
19 a memo that outlines the action so the public can go
20 click on that and look at the memo.

21 Q I guess that makes sense now because in the
22 middle of the page there's a date of 08/31, but
23 otherwise, the document isn't dated.

24 A Uh-huh.

25 Q So I guess this would have been part of the

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1 A It's the same one.
2 Q There's so many and they're reproduced in
3 different forms. I bet it is the same one. So this
4 looks like the same thing as what you referred to as the
5 memo, although it does say, File Number 17-4900 at the
6 top. Otherwise, the body is certainly very similar.

7 Well, then I'll ask you the same question
8 I've asked about what you referred to as the memo. Is
9 this something that you would have prepared?

10 A Yes.

11 Q And if the meeting or the vote was taken
12 August 31st, do you think you prepared the memo days
13 before or would it have been weeks before the meeting?

14 A It would have been no more than a week before.

15 Q And is that something you typically do for
16 proposed ordinances? You prepare a memo?

17 A Yes.

18 Q And that would be part of the agenda that would
19 be posted?

20 A Yes.

21 Q If you would, look at the last page of this
22 document. It has 151, the very last page. Have you seen
23 that page before?

24 A Just recently.

25 Q Just recently?

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2 A No.

(Exhibit 2 marked.)

3
4 Q (BY MR. CRANE) I hand you what's marked Exhibit
5 Number 2. It's addressed to you, so I assume you've seen
6 this before.

7 A Yes.

8 Q This is the invoice from Vault Fine Art
9 Services, correct?

10 A Yes.

11 Q And this is where they're asking for the payment
12 of \$147,000?

13 A Yes.

14 Q And if you look on the first page it says --
15 it's dated 09/15. Did you receive any invoices after
16 this one?

17 A I don't recall. I don't think so.

18 Q If they moved the monument and granite --
19 granite blocks two more times after this, you don't
20 recall getting any invoices for those services?

21 A I wouldn't have -- I wouldn't have been the one
22 who was taking care of that contract, so I only handled
23 the initial relocation, so I don't recall that.

24 Q And you don't remember hearing at a meeting that
25 they've invoiced for additional monies?

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1 A But it was not -- but not until recently.

2 Q Was this not part of the memo for the agenda for
3 August 31st?

4 A I don't think so, no.

5 Q And when you saw it recently, was that part of
6 this lawsuit?

7 A Yes.

8 Q How long ago was that?

9 A Probably within two weeks.

10 Q Before two weeks ago, had you ever seen this
11 before?

12 A No.

13 Q Do you understand what this apparently
14 represents? I mean, the wording is, Petition of the
15 Daughters of the Confederacy to erect a monument in
16 Travis Park. Have you read through this before?

17 A I have recently.

18 Q But before a couple of weeks ago --

19 A No.

20 Q -- you don't recall seeing this before?

21 A No.

22 Q And at the meetings you had with the council
23 members or with Shannon Miller, no one mentioned the
24 existence of what appears to be the City giving
25 permission to the Daughters to erect a monument in Travis

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1 A No.

2 Q Did anyone -- well, let me -- you're the person
3 to ask about this. When you asked Vault to submit a
4 proposal, did you give them a statement of the work you
5 wanted them to accomplish?

6 A I did tell them that I wanted the removal and
7 the relocation to -- and it had to be done in a safe
8 manner. That was it. Then they -- they gave us a scope
9 and we reviewed it.

10 Q Did anyone -- so no one from the City told them
11 maybe in broad terms how they wanted the removal to
12 occur?

13 A Other than being safe and not damage the
14 monument.

15 Q Yes, ma'am. Other than those two cautions,
16 nothing was given them specifically that told them how to
17 do it or how not to do it?

18 A We did get measurements for them, but that was
19 it. And then they submitted a scope to us.

20 Q And when you told them verbally remove it, do it
21 in a safe manner, do you think that was in the two weeks
22 before the August 31st meeting?

23 A Yes.

24 Q In its current location, is the monument and the
25 granite box, are they under any kind of insurance

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1 Q Were you familiar with the statute itself? Did
2 you ever see it yourself?
3 A Absolutely.
4 Q You realize it had carved in the cornerstone,
5 Daughters of the Confederacy?
6 A Yes.
7 Q But as far as you know, no one ever questioned
8 who owned the statue? As far as you know, you and other
9 council members assumed it was the City that owned it?
10 A The City did own it -- does own it.
11 Q Okay.
12 MR. CRANE: Thank you, ma'am. I have no
13 other questions.
14 MR. FITZPATRICK: Off the record? I'm
15 reserving my questions till the time of trial.
16 (Deposition concluded at 4:02 p.m.)

1 I, SHARON L. McDONALD, Certified Shorthand Reporter
2 in and for the State of Texas, do hereby certify that the
3 facts stated by me in the caption hereto are true; that
4 the foregoing deposition transcript of LORI HOUSTON, the
5 witness, herein before named, was at the time mentioned
6 taken by me in stenograph, the said witness having been
7 by me first duly cautioned and sworn upon her oath to
8 tell the truth, the whole truth and nothing but the
9 truth, and later transcribed from stenograph under my
10 supervision.
11 I further certify that I am neither attorney or

REPORTER'S CERTIFICATE/FILING CERTIFICATE
ORAL DEPOSITION OF LORI HOUSTON
August 24, 2018

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF TEXAS
SAN ANTONIO DIVISION
ALBERT SIDNEY JOHNSTON)
Chapter No. 2060, United
Daughters of the
Confederacy, ROBIN
CAROL LANE, First
Vice-President,
PLAINTIFFS,
VS.
THE CITY OF SAN ANTONIO,
SA-17-CV-1072-DAE
DEFENDANT.

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1 to you and express concerns about where it was being
2 kept?
3 A No.
4 Q In its current location, is the City paying any
5 kind of rental fee for the storage?
6 A No.
7 Q The cornerstone has been placed in a facility
8 owned by the City. Does the City have to pay any
9 excess -- any kind of extra funds to do that?
10 A No.
11 MR. CRANE: Can we take a quick break?
12 MR. FITZPATRICK: Absolutely.
13 (Recess taken, 3:56 to 4:00.)
14 Q (BY MR. CRANE) Ms. Houston, just a couple of
15 more questions. You mentioned earlier that your
16 recollection or your understanding was that the Daughters
17 had donated the statue to the City. Do you remember
18 where you formed that understanding?
19 A It would have been part of the history that we
20 received from the Office of Historic Preservation.
21 Q And that's headed by Shannon Miller?
22 A Yes.
23 Q Do you know who did the research for Shannon
24 Miller or did she do it herself?
25 A I don't know.

CHANGES AND SIGNATURE
WITNESS NAME: LORI HOUSTON DATE: AUGUST 24, 2018
PAGE LINE CHANGE REASON

LORI HOUSTON